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Docket No.: R2184.0075/P075
(PATENT)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of:
Masajiro Iwasaki

Application No.: 09/559,255

Group Art Unit: 2672

Filed: April 27, 2000

Examiner: Motilewa A. Good-Johnson

For: PRESENTATION OF IMAGES
RESEMBLING EACH OTHER

REQUEST FOR RECONSIDERATION

Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

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Technology Center 2600

Dear Sir:

Responsive to the Office Action dated July 25, 2003, please reconsider the above-referenced application in light of the following remarks.

Claims 1-18 are rejected under 35 U.S.C. § 102 as being anticipated by Jain. Reconsideration is respectfully requested.

Jain refers to an interface for displaying images such that image similarity is related to the perceptual intuition of the metric. In the Jain system, a display space is generated whose geometric characteristics depend on the geometry of the perceptual space in which image similarity is measured. Specifically, Jain arranges images in a Riemann manifold of N dimensions according to image similarity, and displays the images in a display space made up of three dimensions that are selected by the user from among the N dimensions.

Claim 1 recites the step of “dividing a feature space . . . into sub-spaces having a hierarchical structure.” This is an important aspect of the claimed invention. Jain fails to disclose or suggest the step of “dividing a feature space . . . into sub-spaces having a hierarchical structure.” Contrary to the Office Action, the step is not suggested in Jain, column 10, lines 35-41, which says nothing of “dividing . . . into sub-spaces having a hierarchical structure.”

Moreover, claim 1 further recites the step of “generating a tree structure having the sub-spaces as nodes thereof.” Jain fails to disclose or suggest the step of “generating a tree structure,” much less generating a tree structure whose nodes are the sub-spaces that are divided from the feature space. In contrast to the claimed invention, Jain simply ranks images according to selected criteria (column 9, lines 35+; column 10, lines 42+).

Moreover, claim 1 recites the step of “dividing a display space into . . . spaces corresponding to the respective sub-spaces by taking into account the tree structure.” Jain does not have the recited tree structure to take into account, nor does it have the recited sub-spaces. According to the claimed invention, the “sub-spaces” are divided from the feature space and have a hierarchical structure. Contrary to the Office Action, the second dividing step of claim 1 is not shown in Jain, Fig. 10. Jain does not disclose or suggest that its display is divided “by taking into account [a] tree structure,” much less by taking into account a tree structure whose nodes are sub-spaces of a feature space, where the sub-spaces have a hierarchical structure.

Thus, Jain fails to disclose or suggest important aspects of the invention of claim 1. Please note that the invention may be used to achieve high-speed processing, and it may be used to cope with the situation where image features cannot be represented by vector data or a situation where image similarity cannot be represented by a linear function.

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Claims 9, 17 and 18 should be allowable at least for reasons similar to those discussed above in connection with claim 1, although the claims are different from each other in scope, as noted in the previous response. Claims 2-8 and 10-16 should be allowable along with claims 1 and 9, respectively, and there are other reasons as to why the claims should be allowable. Allowance of the application with claims 1-18, for at least the foregoing reasons, is respectfully solicited.

Dated: October 24, 2003

Respectfully submitted,

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